

**IN THE UNITED STATES DISTRICT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

MICHAEL DAVID SILLS, *et al.*,

Plaintiffs,

v.

SOUTHERN BAPTIST CONVENTION, *et al.*,

Defendants.

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**Docket No.: 3:23-CV-00478
JURY DEMAND**

**MOTION TO DISMISS
BY DEFENDANTS SOUTHERN BAPTIST CONVENTION,
BART BARBER AND ED LITTON**

Defendants Southern Baptist Convention (“SBC”), Bart Barber (“Dr. Barber”) and Ed Litton (“Dr. Litton”) move to dismiss Plaintiffs’ Complaint (“Complaint”) pursuant to Fed. R. Civ. P. 12(b)(1), Fed. R. Civ. P. 12(b)(2) and/or 12(b)(6). For the reasons set forth more fully in the accompanying Memorandum of Law, the SBC, Dr. Barber, and Dr. Litton respectfully request that Plaintiff’s Complaint be dismissed for lack of subject matter jurisdiction, lack of personal jurisdiction (as to Dr. Barber and Dr. Litton) and/or for failure to state a claim upon which relief can be granted.

DATED: July 12, 2023

Respectfully submitted,

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By: /s/ Matthew C. Pietsch

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and complete copy of the foregoing has been served through the Court's electronic filing system to the following on **July 12, 2023**:

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/s/ Matthew C. Pietsch